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11 *Attorneys for Defendant FCA US LLC*

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14
15 WENDY HIGHTMAN,

16 Plaintiffs,

17 v.

18 FCA US LLC,

19 Defendant.

Case No. 3:18-cv-02205-BEN-KSC

**FCA US LLC'S NOTICE OF MOTION
AND MOTION TO DISMISS FOR
LACK OF PERSONAL
JURISDICTION**

[CLASS ACTION]

DATE: January 22, 2019

TIME: 10:30 a.m.

JUDGE: Roger T. Benitez

COURTROOM: 10C

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on January 22, 2019 at 10:30 a.m., or as
3 soon thereafter as counsel may be heard in Courtroom 5A of the above-captioned
4 court, located at 221 West Broadway, San Diego, California 92010, Defendant
5 FCA US LLC will and hereby does move, pursuant to Rule 12(b)(2) of the Federal
6 Rules of Civil Procedure, for an order dismissing this case for lack of personal
7 jurisdiction.

8 This motion is made on the grounds that FCA US is not subject to general
9 jurisdiction in California and Plaintiff's claims are not related to any of FCA US's
10 activities in California.

11 This motion is based on this Notice of Motion, FCA US's Memorandum of
12 Points and Authorities, the Declaration of Michael Royek, and other documents
13 filed in this action, and on such other and further matters as may be presented to
14 the Court at or prior to the hearing.

15
16 Dated: December 13, 2018 **HIGGS FLETCHER & MACK LLP**

17 By: /s/ Edwin Boniske
18 William M. Low (Bar No. 106669)
19 Edwin Boniske (Bar No. 265701)

20 *Attorneys for Defendant FCA US LLC*
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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that a true and correct copy of the
3 foregoing was served on December 13, 2018 on all counsel of record, who are
4 deemed to have consented to electronic service via the Court's CM/ECF system
5 per Civ.L.R. 5.4(d).

6 By: /s/ Edwin Boniske
7 Edwin Boniske (Bar No. 265701)
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